

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 30, 2021

By ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Lado Middlebrooks
21 Cr. 89 (RMB)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: <u>9/30/21</u>

Dear Judge Berman,

I write to respectfully request that the Court postpone today's motions deadline to Monday, October 4, 2021. Undersigned counsel is preparing the motions and needs a few more days to complete the process. The Government, by Assistant United States Attorney Sarah Kushner, has no objection to this application.

If this request is granted, please also adjourn the response and reply deadlines for a few days as well: government's response due October 25 and defense reply due November 1, 2021.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the resolution of the motions.

Thank you for your consideration.

Respectfully submitted,

/s/
Sylvie Levine
Counsel for Mr. Middlebrooks

<u>Application granted on</u>	
<u>consent.</u>	
_____ _____ _____	
SO ORDERED: Date: <u>9/30/21</u>	 Richard M. Berman, U.S.D.J.